UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF NORTH CAROLINA CHARLOTTE, DIVISION 3:21CR 127-FDW-DCK

UNITED STATES OF AMERICA)	
)	
)	
VS.)	MOTION TO CONTINUE
)	SENTENCING HEARING
)	
DOMINIC CERASARO,)	
Defendant.)	
)	

NOW COMES the Defendant, by and through counsel, and respectfully requests that the sentencing hearing that is set for Tuesday, March 29, 2022, at 11:15 am, be continued to a day other than Tuesday or Thursday.

In support of this Motion, the Defendant shows the following:

- 1) The Defendant has received sex offense counseling approximately once a week from Dr, Stuart Groll since approximately December 2020. Dr. Groll has written several reports detailing Mr. Cerasaro's treatment and is a crucial witness at his sentencing hearing.
- 2) Dr. Groll receives kidney dialysis at his home on Tuesday and Thursday. This dialysis is administered by his wife who is a nurse. Dr. Groll is 70 years old, and his energy is greatly diminished following this procedure.
- 3) Defense counsel requests that Mr. Cerasaro's sentencing hearing be set for Monday, Wednesday, or Friday.
- 4) Assistant United States Attorney Stephanie Spaugh consents to this change of date, but will be out of town Friday, April 1, and the next week, so she would prefer Monday, March 28, or Wednesday, March 30, if these dates are available.

Respectfully submitted this the 10th day of March 2022.

s/ David R. Lange, P.A.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on March 10, 2022, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF.

s/David R. Lange, Attorney for Defendant